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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10
11 CRISPIN FRANCISCO SANCHEZ,

CASE NO. 3:11-CV-00433-LRH-WGC

12 Plaintiff,

13 vs.

14 CHEVRON MINING, INC.,

15 Defendant.

EX PARTE MOTION AND
[PROPOSED] ORDER TO EXTEND
TIME TO FILE THE DISCOVERY
PLAN AND SCHEDULING ORDER
(First Request)

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17 Defendant CHEVRON MINING, INC. ("Chevron"), through counsel, hereby moves this
18 Court to extend the deadline for the Discovery Plan and Scheduling Order pursuant to LR 6-1.

19 The Plaintiff, Crispin Francisco Sanchez ("Mr. Sanchez") is currently representing himself
20 and has relocated to Oregon. While Chevron has attempted to contact Mr. Sanchez, the phone
21 number Chevron had for him has been disconnected. Chevron only obtained a working contact
22 number for Mr. Sanchez when the parties attended a status hearing today, March 9, 2012. The
23 current deadline for the Discovery Plan and Scheduling Order is March 12, 2012.

24 Because Chevron has just recently obtained a working contact number for Mr. Sanchez, the
25 parties have yet to conduct the requisite FRCP 26(f) conference. Chevron will attempt to contact
26 Mr. Sanchez by telephone to conduct the FRCP 26(f) conference within the next two weeks. As
27 such, Chevron respectfully requests this Court extend the deadline to file the Discovery Plan and
28

1 Scheduling Order. This is the first motion to extend time to file the discovery plan and scheduling
2 order made by either party.

3 Based on the foregoing, Chevron respectfully requests this Court extend the deadline to file
4 the Discovery Plan and Scheduling Order to March 23, 2012.

5 DATED this 9th day of March, 2012.

6 JONES VARGAS

7
8 /s/ Ann Morgan

9 ANN MORGAN

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16 *Attorneys for Defendant*
17 *Chevron Mining, Inc.*

18 * * * *

19 Pursuant to the foregoing, IT IS SO ORDERED.

20 DATED this 12th day of March, 2012.

21 William J. Cobb
22 UNITED STATES MAGISTRATE JUDGE
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